

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In RE: Maranda Grasley	:	Chapter 13
Debtor	:	
	:	22-02354
Maranda Grasley,	:	
Objector	:	Re. Proof of Claim No. 5
v.	:	
Midland Credit Management, Inc.	:	
Respondent / Claimant	:	

MOTION TO EXTEND DISCOVERY DEADLINE

1. A discovery deadline is approaching, 60 days from September, 21, 2023.
2. A hearing on the merits of the case has been set for January 4, 2024.
3. Debtor believes that Claimant has failed to cooperate with discovery and has hindered the discovery process.
4. Debtor's Counsel has made materially false statements in an answer to Debtor's claim objection which Claimant's Counsel has refused to correct after numerous civil requests.
5. The materially false statements related to the age of the account and the length of time that the account was opened. See previously filed motion to compel incorporated by reference.

6. In order to effectively counter those false statements, additional discovery is needed to bring attention to the falsehood of those statements and possible additional inaccuracies in Claimant's files.
7. For the reasons set forth in Debtor's Motion to Compel Claimant to Cooperate With Discovery, incorporated by reference, an extension of the discovery deadline is warranted.
8. Debtor requests an Order from this Honorable Court extending the discovery deadline for an additional 60 days.
9. Debtor requests such other relief as this Honorable Court deems appropriate.

Wherefore, Debtor requests an Order from this Honorable Court extending the discovery deadline for an additional 60 days. Debtor requests such other relief as this Honorable Court deems appropriate.

/s/ Vicki Piontek

11-20-2023

Vicki Piontek, Esquire

Date

Attorney for Plaintiff

58 East Front Street

Danville, PA 17821

vicki.piontek@gmail.com

215-290-6444

Fax: 866-408-6735